COMMISSION

May 23, 2013

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission P.O. Box 615 211 Sower Boulevard Frankfort, KY 40602

Re: Case No. 2013-00140

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten copies of East Kentucky Power Cooperative, Inc.'s Motion for Amendment of Procedural Schedule.

Please contact me if you have any questions.

Very truly yours,

Mark David Goss

Counsel

Enclosures

Cc: Parties of Record

## COMMONWEALTH OF KENTUCKY

### BEFORE THE PUBLIC SERVICE COMMISSION

#### IN THE MATTER OF:

AN EXAMINATION BY THE PUBLIC SERVICE	)	
COMMISSION OF THE ENVIRONMENTAL	)	
SURCHARGE MECHANISM OF EAST KENTUCKY	)	
POWER COOPERATIVE, INC. FOR THE	)	CASE NO.
SIX-MONTH BILLING ENDING DECEMBER 31, 2012	)	2013-00140
AND THE PASS-THROUGH MECHANISM	)	
FOR ITS SIXTEEN MEMBER DISTRIBUTION	)	
COOPERATIVES	)	

# EAST KENTUCKY POWER COOPERATIVE, INC.'S MOTION FOR AMENDMENT OF PROCEDURAL SCHEDULE

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by and through counsel, and moves the Kentucky Public Service Commission ("Commission") for an Order amending the procedural schedule. EKPC is also filing this Motion on behalf of each of its 16 Member Distribution Cooperatives, all of which are parties to this proceeding. The Member Distribution Cooperatives are: Big Sandy Rural Electric Cooperative Corporation; Blue Grass Energy Cooperative Corporation; Clark Energy Cooperative, Inc.; Cumberland Valley Electric, Inc.; Farmers Rural Electric Cooperative Corporation; Fleming-Mason Energy Cooperative, Inc.; Grayson Rural Electric Cooperative Corporation; Inter-County Energy Cooperative Corporation; Jackson Energy Cooperative Corporation; Licking Valley Rural Electric Cooperative Corporation; Nolin Rural Electric Cooperative Corporation; Owen Electric Cooperative, Inc.; Salt River Electric Cooperative Corporation; Shelby Energy Cooperative, Inc.; South Kentucky Rural Electric Cooperative Corporation; and Taylor County Rural Electric Cooperative Corporation.

In support of this Motion, EKPC states that the Commission entered an Order on May 14, 2013, opening this six-month review proceeding and established a procedural schedule. The

procedural schedule provides that EKPC shall file its prepared direct testimony and responses to the information requested in Appendix B of the May 14, 2013 Order no later than June 7, 2013. The procedural schedule also provides that each of the 16 Member Distribution Cooperatives shall file its responses to the information requested in Appendix B no later than June 7, 2013. Included in Appendix B is a request of EKPC to prepare a summary schedule showing for each of the 16 Member Distribution Cooperatives the pass-through revenue requirement for the months corresponding with the six-month review and a calculation of any additional over- or under-recovery amount the Member Distribution Cooperative believes needs to be recognized for the six-month review. Each of the 16 Member Distribution Cooperatives are requested to provide the actual average residential customer's monthly usage and, based on the usage amount, provide the dollar impact any over- or under-recovery will have on the average residential customer's monthly bill for the requested recovery period.

The 16 Member Distribution Cooperatives cannot finalize their respective responses to Request No. 7 in Appendix B without calculations that EKPC will prepare in its response to Request No. 2. In addition, EKPC will need each of the Member Distribution Cooperatives to review the calculations included in the response to Request No. 2 for accuracy. The exchange and verification of this information will be difficult to complete within the approximate three-week time period permitted in the existing procedural schedule.

Due to the exchange and verification of information needed in order to complete reasonable and accurate responses to the information requests, EKPC and its 16 Member Distribution Cooperatives believe an additional week would be necessary. EKPC and its 16 Member Distribution Cooperatives note that a one week delay from the June 7, 2013 date would not disrupt the remaining events in the procedural schedule, as the next request for information to

<sup>&</sup>lt;sup>1</sup> See Appendix B of the May 14, 2013 Order, Request No. 2.

<sup>&</sup>lt;sup>2</sup> See Appendix B of the May 14, 2013 Order, Request No. 7.

EKPC and its 16 Member Distribution Cooperatives is to be filed no later than July 19, 2013. Granting an extension to June 14, 2013 would still provide five weeks for review and examination of the responses before the next scheduled round of data requests.

WHEREFORE, EKPC respectfully requests that the Commission enter an Order approving an Amendment to the Procedural Schedule and permit the filing of the prepared direct testimony and information responses currently due on June 7, 2013 to be filed no later than June 14, 2013.

Dated this 23<sup>rd</sup> day of May 2013.

Respectfully submitted,

Mark David Goss

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Counsel for East Kentucky Power Cooperative, Inc.

## CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing was served, by depositing same in the custody and care of the U.S. Mail, postage pre-paid, on this 23<sup>rd</sup> day of May 2013, addressed to the following:

Allen Anderson President & CEO South Kentucky R.E.C.C. 925-929 N. Main Street P. O. Box 910 Somerset, KY 42502-0910

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Carol Ann Fraley President & CEO Grayson R.E.C.C. 109 Bagby Park Grayson, KY 41143

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